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April 23, 2018

Hon Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Gabriel Juarez et al. v. Barto Restaurant Corp. et al.  
Case No.: 17-CV-04543 (RJD) (VMS)

Dear Judge Scanlon:

The parties respectfully submit this joint discovery status letter pursuant to the Initial Scheduling Order dated January 16, 2018. (Doc. #19). Defendants respectfully request that the status conference currently scheduled for May 1, 2018 at 10:00 a.m. be adjourned two months until the end of June or beginning of July, 2018 to allow sufficient time for the parties to conduct discovery. Ruchama Cohen, an associate with plaintiffs' attorneys, Samuel and Stein, has consented to this request

My office was substituted for defendants' prior attorney, John Russo, by minute order dated April 10, 2018. As of the date my office was substituted, the defendants had filed an answer to the complaint, but had not served initial disclosures, discovery demands or responded to plaintiffs' discovery demands or settlement demand.

Ms. Cohen has further consented to my request to extend all dates in the Initial Scheduling Order an additional two months, as follows:

1. Defendants will serve initial disclosures by April 27, 2018;
2. Defendants will serve initial document requests and interrogatories by May 21, 2018.
3. Defendants will respond to plaintiffs' interrogatories and document demands by May 21, 2018;
- 4., Defendants may amend their answer without further order of the court on or before May 21, 2018;
5. Fact discovery closes July 13, 2018;
6. The parties must file on ECF a joint letter confirming that discovery is concluded by July 20, 2018;

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7. Any dispositive motion practice must be commenced by August 10, 2018;
8. A proposed joint pretrial order must be filed by September 10, 2018.
9. The parties must file a joint discovery status letter one week prior to the adjourned date of the status conference.
10. Defendant agrees to respond to plaintiffs' settlement demand on or before May 11, 2018.

I thank the court for its time and consideration of these extensions of time.

Very truly yours,

/S/  
Arthur H. Forman

AHF/ms